

Pickens County Branch of the NAACP, et al v. School District of Pickens County.
Civil Action No. 8:23-cv-01736-BHH

Exhibit A

**To School District of Pickens County's Response in Opposition to Plaintiffs' Motion for
Preliminary Injunction**

Declaration of Jessica Preisig

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION**

Pickens County Branch of the NAACP;

Rebecca Turner and Brandon Turner, on behalf of
minor children J.T. and G.T.;

Susanna Ashton and Peter Laurence on behalf of
minor children H.L. and C.L.;

Reba Kruse and Derrick Kruse on behalf of minor
children S.K. and R.K.,

Plaintiffs,

v.

School District of Pickens County,

Defendant.

Case No. 8:23-cv-01736-BHH

DECLARATION OF JESSICA PREISIG

I, **JESSICA PREISIG**, declare pursuant to 28 U.S.C. § 1746 as follows:

1. My name is Jessica Preisig. I am over the age of 18 and am competent to make this declaration. I am a citizen and resident of South Carolina. The facts stated herein are true of my own personal knowledge, and if called to testify, I would so testify.
2. I am the Assistant Superintendent for Technology Services at the School District of Pickens County, where I have worked since July 2022.
3. I am familiar with the book *Stamped: Racism, Antiracism, and You* ("*Stamped*").
4. *Stamped* was first stocked in libraries in the School District of Pickens County in 2020. Specifically, the Pickens High School Library obtained a copy on August 28, 2020, and the Liberty High School Library obtained a copy on October 19, 2020.
5. The School District of Pickens County still has only two copies of *Stamped* in its high school libraries: one copy at the Pickens High School Library and one copy at the Liberty High School Library.
6. Daniel High School and Easley High School have never had a copy of *Stamped* in their libraries or media centers.

7. Subject to any applicable requirements or limitations, students at high schools within the School District of Pickens County can request an intra-District Library loan through the librarian for books that are not available at their own high school.
8. From 2020 until the present, *Stamped* has never been checked out from Liberty High School Library, and, based on the best information available to us, has been checked out three or fewer times from Pickens High School Library.
9. Collectively, the School District of Pickens County's high school libraries stock books about contemporary issues of race, racism, the black experience in America, and police violence; books about slavery in America—including biographies and personal narratives of enslaved people; books about the abolition movement; books about the civil rights movement, including multiple books by or about Dr. Martin Luther King, Jr.; multiple books about Malcolm X, including his autobiography; books about black social leaders and activists; books about Karl Marx, socialism, communism; and over a dozen books by Jason Reynolds (the co-author of the book *Stamped*), including his novels exploring contemporary issues of race and racism in America.
10. In addition, various of the District's high school libraries presently carry the following books: *Dear Martin*; *Brown Girl Dreaming*; *Claudette Colvin: Twice Toward Justice*; *A Few Red Drops: the Chicago Race Riot of 1919*; and *I'm Not Dying With You Tonight*.
11. I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 10th day of July, 2023.

Jessica Preisig 7/10/23
Jessica Preisig